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5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF WASHINGTON
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8 In re:

Case No. 24-01421-FPC11

9 IDEAL PROPERTY INVESTMENTS, LLC,
10

11 Debtor.
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DECLARATION OF DONALD
JAMES IN SUPPORT OF JAMES
GROUP'S MOTION FOR RELIEF
FROM STAY

13 I, Donald James, do hereby swear and affirm as follows:

14 1. I am the Manager of James Group International LLC ("**James Group**"). I am of legal
15 age and competent to testify to the matters contained herein.

16 2. My father, Ronald James, was the previous Manager of James Group. He executed the
17 contract at issue between James Group and Water Station Management, LLC.

18 3. My father began having what we thought were Parkinson's symptoms some time in
19 2016.

20 4. His neurologist started to also note signs of dementia, related to the then Parkinsons
21 diagnosis. His disease wasn't displaying the typical symptoms and didn't respond to the L-Dopa
22 medications. His relief at times was temporary and his tremors were not well managed.
23 Sometimes he would become catatonic.

24 5. When Ron met with Ryan Wear, Richard Wear, and others in or around December
25 2019, I had to hire a wheelchair to get him through the airport and travel to the Water Station
26 offices in Everett.

27 6. During the next several months, his decision making was impaired by occasional
28 staring spells and "hallucinations". He would at times fall asleep at his desk. He became more
forgetful and agitated.

APPLICATION FOR RELIEF FROM STAY

24-01421-FPC11 (4)

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7. As 2021-2024 progressed, he continued to decline. He had moments of lucid clarity, offset with stretches of incapacity.

8. Some time around January 2024, my father was diagnosed with brain cancer, specifically two (2) large glioblastomas. His medical providers admitted that also admitted that the locations of the tumors could have illustrated symptoms similar to his initial Parkinsons diagnosis.

9. Over time, his condition declined. Ronald James died April 20th, 2024.

10. I truly believe he was misdiagnosed with Parkinson's disease and was actually suffering from these brain tumors in 2018.

11. He lacked the capability to properly pursue the UCC filings due to the effects of the tumors and their impact on his cognitive abilities and ability to follow through on needed requirements.

EXECUTED this Friday, October 18, 2024, in Lafayette, California.

I, the undersigned, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

/s/ Donald "Don" James
Donald James

APPLICATION FOR RELIEF FROM STAY

24-01421-FPC11 (5)

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